Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of   )
)

Modernizing the E-rate   )   WC Docket No. 13-184
Program for Schools and Libraries   )

<u>Comments from United Systems, Inc.</u>

September 16, 2013

Response Due Date: September 16, 2013

United Systems, Inc. is an end-to-end technology solution provider that offers products and integration services which include network, voice and data categories. We also provide remote and on-site support services related to the products we sell and integrate. We have participated in the E-rate program as a Priority 2 Service Provider for Internal Connections and Basic Maintenance services since the program's inception.

We have a long history of successful participation in the E-rate program and believe it provides resources for schools they could not receive any other way. We are pleased to see that there is an effort to positively impact the program through the FCC's Notice of Proposed Rule Making (NPRM) that is currently open for comment.

In general, we are of the belief that the program needs more funding to address new technologies and capacities that were not available when the program was initiated. We also believe program complexity needs to be reduced and expediency needs to be improved. Improving expediency to ensure application decisions are being made as close to the beginning of the Funding Year as possible will help improve the funding request demand on the program by reducing duplication in applications.

One additional general comment we would make is that Priority 1 and Priority 2 services are equally important. In other words, there is no way to achieve optimum performance from Telecommunications and Internet Services without matching Internal Connections capabilities, and vice versa.

United Systems, Inc. submits the following additional specific comments to the FCC NPRM regarding Modernizing the E-rate Program for Schools and Libraries:

- Too many services that would be most appropriately delivered as Priority 2 services have been moved to Priority 1. This has created circumstances where services are costing the fund three times or more over the useful life of the solution as what they could be acquired for as Internal Connections as a "one-time" cost. There is more of an effort to move items to Priority 1 just for certainty of funding, rather than if it is the correct solution/decision. This is one of the larger

factors in creating new and undue demand on the fund. An example of this is Interconnected/Hosted Voice-over-IP.

- Decisions on Basic Maintenance services are coming too late in the funding year for schools to take advantage of the services. Schools cannot typically afford to hire the staff required to administer and support the types of technology required for sophisticated voice, data and video networks. This can create an environment where the school does not receive optimum performance of their resources and subsequently staff and students are affected. It is important for Basic Maintenance services to be provided in a more consistent manner and early in the funding year.

Sincerely,

Alvin Myers, President and COO